



Nov 16, 2016

**Submitted online at:**

<https://public.medicaid.gov/connect.ti/public.comments/answerQuestionnaire?qid=1888259>  
Centers for Medicare & Medicaid Services  
7500 Security Boulevard  
Baltimore, MD 21244

**Re: Illinois' Behavioral Health Transformation Section 1115 Demonstration Waiver**

The Illinois Association of Medicaid Health Plans (IAMHP) is pleased to offer comment on the Department of Healthcare and Family Services' Section 1115 Demonstration Waiver proposal. IAMHP is a trade association representing all 13 health plans coordinating care in the state of Illinois. Our members care for over 2 million Illinoisans and we strive to lead the ongoing transformation and innovation of Illinois' Medicaid delivery system to achieve better healthcare outcomes for our state's most vulnerable citizens.

We are encouraged by and support the proposed Section 1115 Demonstration Waiver. IAMHP views this proposal as a framework to cultivate and expand partnerships between managed care organizations (MCOs) and community-based provider agencies. MCOs have made great strides to build partnerships with community-based provider agencies, and we believe the Section 1115 Demonstration Waiver, which supports expanding those partnerships and building new ones, will further Illinois' Medicaid delivery system and health outcomes for the individuals it supports.

The six Demonstration Waiver benefits identified in the proposal align with the principles of Medicaid managed care. They recognize the value of providing "whole-person" care through a continuum of services and supports, especially with regard to the behavioral health needs of the target population and allowing for non-medical supports such as supportive housing and supported employment services that are vital to the successful care of an individual.

IAMHP is encouraged by the recognition that there is a need to invest in system changes that allow our Medicaid program to integrate behavioral and physical healthcare, expand Early Intervention Services, strengthen the behavioral healthcare workforce, and develop First Episode Psychosis programs.

IAMHP respectfully offers the following points of interest:

- There is insufficient information available regarding the complimentary State Plan Amendments (SPAs) and Advanced Planning Documents (APDs). Managed Care Organizations intend to be fully involved in areas that rely on the SPAs (e.g. Integrated Health Homes) and the ADPs, but we must be fully informed of the process in order to work collaboratively.
- Allowing major components of the Demonstration Waiver to be dependent upon non-Medicaid funding sources raises concern whether the long-term success of the Demonstration Waiver could be jeopardized. For example, if funding for rental subsidies is not available through the Department of Human Services, one of the six Demonstration Waiver benefits – supportive housing – will be threatened.



- There is a need for more detailed information regarding the transition of care for IDOC justice-involved individuals from the corrections facility to the community.
- There is no assurance that any Information Technology system changes will be compatible with MCO systems.
- Section 6 of the waiver contains the financial impacts and budget neutrality projection. The projection is aggregated with all Medicaid programs rolled together. The MCOs participating in Illinois have experience that the behavioral and physical health utilization varies greatly by covered population. We believe it would be more appropriate for the historical and projected data be broken out by the major contracts of ICP, FHP and ACA.

IAMHP respectfully offers the following requests.

- Rates for providers and Managed Care Organizations must support costs associated with innovation and high-quality healthcare
- Prior to implementation, provide education regarding rates, billing codes, services limitations, etc.
- Target as much investment as possible into expanding proven models of care – e.g., behavioral and physical health integration
- Ensure resources are also available in downstate regions that have fewer resources to meet behavioral health and substance abuse needs of service recipients
- Allow for full input of all stakeholders (MCOs, providers, advocates, etc.) as we move this Demonstration Waiver forward. Full participation is key to successfully partnerships

IAMHP supports the Section 1115 Demonstration Waiver proposed by the Department. We believe this Demonstration Waiver will provide the ability for Managed Care Organizations to improve and expand our partnerships with community-based provider agencies, which in turn will improve the Medicaid delivery system in Illinois and, most importantly, the health outcomes for the behavioral health population.

Thank you for the opportunity to provide feedback to the Department's Section 1115 Waiver Demonstration Proposal. IAMHP appreciates the opportunity to inform the process, and looks forward to working with the Department on the Waiver's implementation.

Sincerely,

Samantha Olds Frey

Executive Director  
Illinois Association of Medicaid Health Plans